

IN THE UNITED STATE DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re: Asbestos Products Liability Litigation (No. VI); MDL 875

Regarding:

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA

GRADY O. HUMPHREYS, et al.,

Plaintiffs,

vs.

A. O. SMITH ELECTRICAL PRODUCTS
COMPANY, a division of A. O. SMITH
CORPORATION, et al.,

Defendants.

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Civil Action No. 07-CV-607-WKW

**DEFENDANT RAPID AMERICAN CORPORATION'S
JOINDER IN MOVING DEFENDANTS' MOTION FOR
PARTIAL SUMMARY JUDGMENT AND BRIEF IN SUPPORT OF
MOTION FOR PARTIAL SUMMARY JUDGMENT**

Defendant, Rapid American Corporation., by and through its attorney of record, hereby joins in and adopts by reference as if set forth fully herein, the Motion for Partial Summary Judgment (Doc. 244) and the Brief Supporting the Motion for Partial Summary Judgment (Doc. 245) filed on behalf of Moving Defendants, Borg Warner Morse TEC, Inc.; Exteco, Inc., f/k/a Thermo Electric Co., Inc.; and The Marley-Wylain Company, d/b/a Weil-McLain Company, Inc. In the filing this Motion for Partial Summary Judgment, Rapid American Corporation does not in any way waive any grounds set forth in its previously

filed Motion to Dismiss, nor does it waive any additional grounds for summary judgment as to any plaintiffs against whom summary judgment is sought in this motion, nor does it waive any grounds against any plaintiffs against whom summary judgment is not specifically sought in this motion.

Respectfully submitted this 17th day of April, 2008.

/s/ E. L. McCafferty, III
E. L. McCAFFERTY, III (ASB-6710-C64E)
Attorney for Rapid American Corporation

OF COUNSEL:
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CERTIFICATE OF SERVICE

I hereby certify that I have on this 17th day of April, 2008, served a copy of the foregoing by electronic means via the CM/ECF to those registered with the CM/ECF.

/s/ E. L. McCafferty, III